

United States Bankruptcy Court for the District of Delaware  
824 Market Street, 3rd Floor, Wilmington, Delaware 19801  
Case No. 22-11068 (KBO)

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US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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## Claimant Response to Objection to Proof of Claim

IN THE UNITED STATE BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

**DEBTORS:** FTX TRADING., et al.,

**CASE NUMBER:** 22-11068 (JTD)

**OBJECTION:** The Claimant (99989) has filed this claim after the applicable FTX customer claim bar date. Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.

**Name of Claimant:** Ronald J Bierer

**Claim Number:** 99989

**Description of amount:** \$37,356.2900000000000000 USD

**Factual Basis:** I filed my claim based on my verified account on the FTX platform under the email address: **rjbierer@bigpond.net.au**

To the best of my knowledge and recollection, between April 2022 and September 2022, I engaged in verbal telephone conversations with the following individuals who identified themselves as representatives of Blue Royal Investment:

Linda Adams – Claimed to be an Account Manager  
 Nina Katz – Claimed to be a Senior Account Manager  
 Benjamin Phillips – Claimed to be the Chief Trading Officer  
 Marek Herman – Claimed to be the Chief Trader  
 Jason Brook – Claimed to be a Trader  
 Lucas Hill – Claimed to be the Chief Supervisor

It is reasonable to conclude that these individuals would have been authorised or accredited to act on behalf of Blue Royal in relation to their dealings with the FTX platform, particularly in managing client accounts such as that of R. J. Bierer.

My personal account keeping showed, every time a call from one of the above traders was received, trades on Ethereum through the FTX platform occurred and grew my account. The following shows the brief exchanges:

<b>Initial investment</b>	<b>Growth</b>	<b>Date</b>
250 USD		Apl 2022
	3 194 USD	Early May
	3 514.65 USD	May 12th
	3 833.05 USD	May 24th
	5 833.05 USD	June 1st
	6 667.60 USD	June 2nd
	16 641.59 USD	June 13th
	24 662.44 USD	July 22th
	27 330.00 USD	July 27th
	33 079.38 USD	July 28th
	34 049.14 USD	July 30
	37 356.29 USD	Sept 2022

My account contained the following USD amount at the time of the platform's collapse on or about November 11, 2022: 37 356.29 USD

Although I do not currently have access to my historical account screenshots or transaction records (due to the sudden BlueRoyal platform shutdown and loss of access), this information was entered truthfully and in good faith at the time of filing my proof of claim. My account was never closed, nor were funds withdrawn prior to the bankruptcy.

**Supporting Legal Argument:** Initial contact was established by Landis Rath & Cobb LLP and Sullivan & Cromwell LLP on May 1, 2024, with further correspondence received on June 27, 2024, and January 3, 2025.

Given that the law firms Landis Rath & Cobb LLP and Sullivan & Cromwell LLP were in possession of my contact information and corresponded with me regarding the process of claiming returns from the FTX Recovery Trust, I find it difficult to understand how FTX can now assert that, *'Utilizing the information provided within the claim form and following a robust review of the books and records, the FTX Recovery Trust has not identified any liability owing to, or customer entitlement of, the claimant.'*

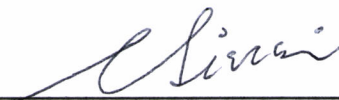
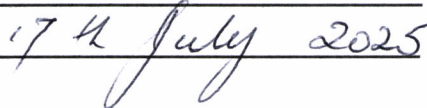
**All other documentation/evidence:** A proof of claim form was completed on 12 March 2025, with the confirmation ID of: 3265-70-DUWXS-764887276

On 9 May 2025, I received an email from the FTX Recovery Trust indicating a failure to complete the Know Your Customer (KYC) process, with instructions provided to do so via the online portal by June 2nd. I was unable to access the portal entirely. Repeated email attempts to resolve this issue, on the 9 May, 13 May, 19 May, 20 May, and 24 May, showed FTX Support's responses were limited to automated replies reiterating the same KYC steps and corresponding completion dates, with no resolution achieved. On 28 May, an email from FTX Support informed me that the portal had been disabled for users who had not logged in and completed KYC verification by 2 June 2025. This sequence of events significantly hindered my ability to complete the claims process requested.

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**Address:** 127/192 Caroline Chisholm Drive, Winston Hills, NSW 2153, Australia.  
**Mob:** +61 417 693 742  
**Email:** rjbierer@bigpond.net.au

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_





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